

**GLOBAL FORCE,
ENTERTAINMENT, INC. and
JEFFREY JARRET**

V.

**ANTHEM SPORTS & ENTERTAINMENT
CORP. and ANTHEM WRESTLING
EXHIBITIONS, LLC,**

JURY DEMAND

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mandating they produce responsive documents so the parties may continue with discovery. Plaintiffs do not request fees, costs, or any other sanction in association with this Motion.

WHEREFORE, Plaintiffs respectfully request an Order compelling Defendants to produce documents responsive to Requests for Production Nos. 13 and 14.

Respectfully submitted,

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LOCAL RULE 37.01(b)(2) CERTIFICATION

The undersigned hereby certifies that a meet and confer with opposing counsel was requested on January 28, 2019 in a good faith effort to resolve by agreement the issues raised in the above Motion to Compel. The request was denied by Defendants, stating it would be unproductive because they are required to keep the responsive documents confidential except pursuant to a Court Order. For the same reason, no joint statement is filed herewith.

/s/ Samuel F. Miller
Samuel F. Miller

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of February 2019, the foregoing document was served via the Court's CM/ECF system upon the following:

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/s/ A. Grace Van Dyke James
A. Grace Van Dyke James